

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RICARDO RODRIGUEZ,) No. 18 C 7951
)
Plaintiff,)
)
vs.) Chicago, Illinois
)
CHICAGO POLICE OFFICERS REYNALDO)
GUEVARA, ERNEST HALVORSEN, RICHARD)
CURLEY, ROBERT BIEBEL, ED MINGEY,)
LEE EPPLEN, M. SANDERS, J. MOHAN,)
and UNKNOWN OFFICERS, and the CITY)
OF CHICAGO,)
) May 3, 2022
Defendants.) 10:31 a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HON. SUSAN E. COX, MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiff: MS. RACHEL E. BRADY
Loevy & Loevy,
311 North Aberdeen Street, 3rd Floor,
Chicago, Illinois 60607

For Defendant
Reynaldo Guevara: MR. THOMAS MORE LEINENWEBER
MS. MEGAN K. McGRATH
Leinenweber, Baroni & Daffada, LLC,
120 North LaSalle Street, Suite 2000,
Chicago, Illinois 60602

For all Individual
Defendants: MR. JOSH M. ENGQUIST
The Sotos Law Firm, P.C.,
141 West Jackson Boulevard, Suite 1240A,
Chicago, Illinois 60604

For Defendant
City of Chicago: MS. EILEEN E. ROSEN
Rock, Fusco & Connelly, LLC,
321 North Clark Street, Suite 2200,
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Patrick J. Mullen, Official Court Reporter
219 South Dearborn Street, Room 1412, Chicago, Illinois 60604

1 (Proceedings in open court on the record.)

2 THE COURT: Good morning, everyone. Have a seat.

3 (Brief pause.)

4 THE COURT: I'm going to ask that you keep your masks
5 on when you are not talking, if that's okay with you.

6 So thank you for your reports regarding the
7 outstanding discovery issues and getting them to me as
8 expeditiously as you did. Does either side or any party have
9 anything they would like to add to the record? Plaintiff?

10 MS. BRADY: The only thing, Your Honor, that I
11 realized when I was reading defendants' report is I'm learning
12 now that they're attempting to mischaracterize this situation
13 as a lack of diligence on our part. The only thing I want to
14 say about that -- and I will not belabor what's in our
15 report -- is that there were pieces of this Curley GPR missing
16 from the defense file that we've been pursuing throughout
17 discovery, and the fact that there were elements of this that
18 were raised throughout discovery, we needed Judge Ramos'
19 deposition to tie it all together, which is why it happened.

20 THE COURT: Yes, and you waited until after the close
21 of discovery to take it.

22 By the way, I should have before we started had all of
23 you enter your appearances. Look at how out of practice we
24 are.

25 (Laughter.)

1 THE COURT: I mean, it's just that this is the first
2 in-person discovery hearing I've had since 2020. So
3 congratulations.

4 Go ahead and say your name, please, and then you guys
5 do the same.

6 MS. BRADY: Good morning, everyone. This is Rachel
7 Brady on behalf of the plaintiff.

8 THE COURT: Good morning.

9 MS. ROSEN: Eileen Rosen on behalf of defendant City
10 of Chicago, and I'll say on my behalf this is the first hearing
11 I've had since 2020.

12 THE COURT: Well, welcome.

13 MS. ROSEN: So it's nice to see you in person.

14 THE COURT: We aren't going to have very many, but it
15 seemed to me that this one should be in person. So go ahead.

16 MR. ENGQUIST: Josh Engquist on behalf of Halvorsen,
17 Curley, Biebel, Mingey, Epplen, and Sanders.

18 THE COURT: All right.

19 MS. McGRATH: Good morning. Megan McGrath on behalf
20 of defendant Guevara.

21 THE COURT: Okay. So you were saying that it wasn't
22 until Judge Ramos' deposition that you really became aware of
23 the true nature of this file. But again, that deposition took
24 place by agreement after I closed discovery over objection.

25 MS. BRADY: I believe, Your Honor, not that this

1 matters very much, but the deposition took place on the last
2 day of discovery. I mean, I --

3 THE COURT: I mean, really, in all honesty, it doesn't
4 make really one wit of difference in terms of the larger point.
5 Anything else you'd like to raise?

6 MS. BRADY: Yes. So to that point, we didn't intend
7 to take Judge Ramos' deposition because we thought that this
8 homicide file issue had been clearly decided by this Court in
9 Bouto. So we didn't think that we needed Judge Ramos'
10 deposition. We thought we would be able to kind of piece
11 together the --

12 THE COURT: That doesn't follow at all because in
13 that, in the decision on the protective order, I made it clear
14 that if you believed there was a, quote-unquote, Brady
15 violation -- which, by the way, I don't believe this is, and
16 I'll talk about that in a minute -- you were supposed to come
17 to me immediately and tell me. So that doesn't wash, either.
18 Sorry. Nice try, but no.

19 Anything you guys want to say?

20 MS. ROSEN: No, Judge. I think we made clear our
21 position in the papers, and it really just has to do in the
22 city's view with an attempt to bootstrap, you know, some
23 ambiguous testimony from Judge Ramos to get Monell homicide
24 file discovery that plaintiff did not pursue.

25 THE COURT: Right. But can you really say, Ms. Rosen,

1 with a straight face that you were unaware of the plaintiff's
2 desire to get these files which have been produced across the
3 board in the Guevara cases?

4 MS. ROSEN: So what I can say is that, sure, but the
5 manner in which the files were produced across the board varied
6 case by case.

7 THE COURT: Right.

8 MS. ROSEN: And this case sat slightly differently due
9 to the one year or so delay because of Mr. Rodriguez's fugitive
10 status. That sort of put the whole case on hold, and so the
11 other cases sort of progressed while this one did not while the
12 motion was pending. Then Mr. Rodriguez got picked up, and then
13 the case started moving again.

14 There were discussions. I certainly do not deny that
15 I had discussions with Mr. Ainsworth specifically about
16 homicide files and, in fact, he reached out to me after this
17 Court issued a ruling on, I believe, not the city's protective
18 order, but the run-of-the-mill model protective order where
19 there was a dispute. You cautioned the parties that you had
20 ruled and that we should understand your position on that.

21 So Mr. Ainsworth reached out to me and suggested that
22 this Court had ruled in Bouto that five years was appropriate.
23 This was at the time the Rule 72 objection was pending, and he
24 proposed the same thing but added the caveat that the city had
25 to stipulate that that was a statistically significant sample.

1 THE COURT: Right, I recall that.

2 MS. ROSEN: Yeah. And so the city has never done
3 that. No court has ordered the city to do that. Then the
4 discussions ended. Then in September, I believe, of 2021,
5 Ms. Brady reached out by email and asked what we were going to
6 do with the homicide files and did we have a final position,
7 and at that point we had already had a hearing in front of this
8 Court on the city's motion for a protective order where you
9 indicated you were seriously considering reconsidering
10 bifurcation.

11 THE COURT: Right.

12 MS. ROSEN: So I suggested that we table the
13 discussion till we got your ruling, which we did in November of
14 2021, and plaintiff never came back to the city to say: I want
15 these files.

16 It wasn't until we got the discovery in the end of
17 February, the written discovery, that we had gotten across all
18 the cases asking for a request to admit and things like that
19 about the city's policy as it relates to the homicide files,
20 which prompted me to reach out to plaintiff to say, you know,
21 we have had discussions and we produced the CR files. Like
22 that happened, and there was no discussion about homicide
23 files. It's a lot of work to pursue that claim. So if I
24 hadn't heard from them, I said: I was under the understanding
25 you weren't pursuing it.

1 That was at the -- by the time we had that discussion,
2 it's mid-March or late March and discovery is closing. Then
3 that --

4 THE COURT: Discovery actually closed, I think, in
5 February, February 28th.

6 Am I wrong about that, Mike? I might have that
7 screwed up in my head.

8 (Discussion off the record.)

9 MS. ROSEN: Yeah, I think it might have been March
10 29th. But regardless, this was happening right at the end, and
11 it was at that point that Ms. Brady told me that, no, I had
12 agreed to five years worth of homicide files. So I said:
13 Okay. Well, show me where I agreed. I mean, I'm dealing with
14 a lot of these cases across the board. I could have forgotten.

15 She couldn't show me where I did, and then she flipped
16 her position to: Well, we'll just use the Reyes files.

17 THE COURT: Which have been produced.

18 MS. ROSEN: Yes, the Reyes files have been produced.
19 That's correct.

20 THE COURT: So is it fair to say that there's
21 virtually no real burden on the city if they were to be ordered
22 to be produced here?

23 MS. ROSEN: There's no burden in terms of the fact
24 discovery.

25 THE COURT: Right.

1 MS. ROSEN: There's a burden as it relates to what's
2 going to happen once we get to the expert phase, because as we
3 now know the homicide file expert discovery in Solace-Reyes,
4 because of the way the experts have dealt with the files has
5 now created another six-month delay in Solace-Reyes to complete
6 expert discovery.

7 So, yes, I mean, it's easy enough for the city to
8 simply Bates stamp those files or designate them, and then we
9 can issue our contention interrogatories and whatever written
10 discovery we have around those files.

11 THE COURT: Why would you need to do that? Fact
12 discovery is closed.

13 MS. ROSEN: Well, so when we have the homicide files,
14 then the next step for the city is typically, okay, to identify
15 from these files every Brady allegation, every allegation of
16 fabrication, and that's typically how the city begins its
17 defense on the homicide files once we get to the expert phase.
18 So because the city did not know that plaintiff wanted the
19 homicide files or intended to use them, we didn't issue that
20 discovery because we thought it was a dead issue.

21 THE COURT: Are you saying that that discovery would
22 be issued as part of expert discovery or as part of fact
23 discovery?

24 MS. ROSEN: It has historically been done as part of
25 fact discovery.

1 THE COURT: But there's no reason why. What you're
2 really saying is that your expert -- and I assume you have the
3 same expert across the board in these cases or set of experts,
4 is that right?

5 MS. ROSEN: Typically, yes.

6 THE COURT: Yes.

7 MS. ROSEN: Yes.

8 THE COURT: So, I mean, to that extent, it just seems
9 to me that there would be a clear overlap in effort, but I'll
10 get to that in a minute.

11 Mr. Leinenweber, is that you behind that mask?

12 MR. LEINENWEBER: Good morning, Your Honor.

13 THE COURT: Good morning.

14 MR. LEINENWEBER: Nice to see, Your Honor.

15 THE COURT: Go ahead and enter your appearance,
16 please.

17 MR. LEINENWEBER: Good morning, Judge. Tom
18 Leinenweber also on behalf of defendant Reynaldo Guevara.

19 THE CLERK: Can you speak closer to a mike?

20 THE COURT: Yes, and also keep your mask up while
21 speaking.

22 MR. LEINENWEBER: No problem.

23 Good morning, Judge. Tom Leinenweber also appearing
24 on behalf of defendant Reynaldo Guevara.

25 THE COURT: Good morning.

1 So anything else anybody wants to say?

2 MS. BRADY: Can I speak briefly to that, Your Honor?

3 THE COURT: Sure, of course.

4 MS. BRADY: After the initial rounds of
5 meet-and-confers about the homicide files, we tried for three
6 months to get the city to give us its position. So to the
7 extent the city is suggesting that they weren't aware we were
8 pursuing this, we tried for months and the city has had a
9 lengthy gap in between when they agreed to do something and
10 when they actually produced the CR files. It took four months
11 for us to get them.

12 THE COURT: Okay. And yet you knew and at all times
13 you knew that had you brought a motion to compel regarding a
14 subset of the homicide files that it most certainly would have
15 been granted, correct?

16 MS. BRADY: Yes, Judge.

17 THE COURT: But you did not. At any point, you did
18 not. So you say you didn't get a position from the city.
19 Okay. Maybe you didn't. Maybe you did. I don't know, and I'm
20 certainly not going to read the 5,000 emails you guys probably
21 wrote on this issue.

22 But, in fact, your firm on behalf of the plaintiffs in
23 these cases has never been shy about coming to this Court and
24 requesting relief when you truly believed that you needed
25 something and the city wasn't producing it. Is that a fair

1 assessment?

2 MS. BRADY: Yes.

3 THE COURT: Okay.

4 MS. BRADY: But --

5 THE COURT: But what?

6 MS. BRADY: Honestly, to be totally frank, Your Honor,
7 this is the first of these cases that I'm leading myself.

8 THE COURT: Understood.

9 MS. BRADY: I know that this Court has admonished us
10 not to file things, and so honestly I --

11 THE COURT: You know, don't you even start to put it
12 back on me. That is the very definition of a dead end. I have
13 seen motion to compel after motion to compel, motions for
14 protective orders throughout both this case and Bouto. So the
15 fact that, you know, I've urged as the rules require that the
16 parties meet and confer and try to work things out should never
17 have been construed, nor do I think you really did construe it
18 as an admonition that you shouldn't file a motion to compel.

19 MS. BRADY: Sure.

20 THE COURT: I'm not buying that.

21 MS. BRADY: Sure, and I did mean to suggest that the
22 Court admonished us not to file a motion. But I thought that
23 the Court's ruling in Bouto made it clear and that a motion
24 wasn't necessary, and I did not want to burden the Court with a
25 duplicative filing.

1 THE COURT: Right. But when you don't, when you don't
2 get something that you think has been ordered, you take the
3 appropriate steps, and that didn't happen here. I mean, I
4 think the record is really clear. I mean, I have -- so here's
5 the thing. I think the plaintiff has been aware of this issue
6 with what we're calling the Curley GPR.

7 By the way, what does "GPR" stand for?

8 MS. ROSEN: General progress report.

9 THE COURT: All right. I think it's clear that you
10 were aware of this issue since early on in this case. I don't
11 think any of this has been a surprise to the plaintiff, and I'm
12 baffled as to why if you believed truly that this is a
13 violation of your client's constitutional rights that's
14 actionable that you would have waited until either the last day
15 of discovery or after discovery -- and I don't know which -- to
16 take a deposition which now you claim to be essentially the
17 most important evidence on this point. That doesn't, that
18 doesn't compute for me.

19 Now, I don't think, I don't think this file is Brady
20 material for all kinds of reasons. Even assuming that the file
21 wasn't turned over to the defense -- and by the way, we have no
22 way of knowing that. There is no way either I, you, the
23 defense parties, or a potential jury is ever going to be able
24 to know that because the defense file, as I understand it, has
25 been destroyed. So what we are left with is Ms. Ramos'

1 testimony which can be read different ways, that compounded by
2 the fact that the state's attorney's file includes this
3 material.

4 Again, the facts on this are very -- in my mind are
5 very, very gray. Ultimately it won't be my call, but the idea
6 that this definitively establishes a violation of
7 constitutional rights -- by the way, it's not Brady. This
8 isn't exonerating material. It's Giglio. The best thing that
9 could happen here is that had Ms. Ramos -- hypothetically, if
10 she had not had this file or if she had the file, she would
11 have simply cross-examined the witness about his failure to
12 identify your client on an earlier occasion. Then the jury
13 would do with that information what they always do with
14 impeaching information. Either it would be very important to
15 them or it wouldn't be. We have no way of knowing.

16 So whether this is a constitutional violation or not,
17 I don't know, but if it is it's a Giglio violation, not a Brady
18 violation, because there's nothing about that that exonerates
19 your client, which is what Brady is about. Okay?

20 By the way, just because something was turned over to
21 the prosecutor, if it wasn't turned over to the defense, it's
22 still potentially a constitutional violation. The problem is
23 the record here. It's not conclusive in any way, shape, or
24 form.

25 I don't buy fundamentally the notion that anything

1 that happened with this particular report suddenly made the
2 need for homicide files apparent to the plaintiff. I think
3 what really happened here -- and I say this respectfully, Ms.
4 Brady -- is your firm dropped the ball on this. There are a
5 lot of cases, there have been a lot of rulings, and you just
6 didn't pursue this.

7 So now in my mind what I find difficult is you are
8 trying to after the fact justify sort of negligence in terms of
9 obtaining these files which have been produced in every one of
10 these Guevara cases by trying to retrofit this excuse as: Oh,
11 the dawn has broke. Now we know we need them.

12 You've known for some time that you wanted these
13 files. You just didn't pursue them. I would be a lot more
14 impressed with your papers if you had actually come out and
15 said: Look, we messed up. We didn't follow up. We should
16 have, but it's unfair to penalize our client for our mistake in
17 not filing a motion to compel and getting what you have ruled
18 relevant, you know, across the -- what every judge in this
19 district has ruled as relevant across the board.

20 I just -- this is not a -- the existence of this file
21 does nothing in my mind to make these more or less relevant,
22 and if it did, it did a long time ago and it's still basically
23 you didn't do anything. The problem I have, I agree with the
24 city that this is a pretext and I agree with the city that you
25 didn't do what you should have done, but the problem I have is

1 Mr. Rodriguez, the client here.

2 If I don't give them access to some of these files, he
3 will be the only plaintiff across the board in the Guevara
4 cases that will not have access to some part of this discovery,
5 and the only reason that happened is that his law firm didn't
6 follow up with you. You knew, I think, throughout this period
7 that they wanted these files, and you kind of just sat on your
8 hands, which I guess is a tactic but not one I particularly
9 like because you knew that I would -- if it came to me, that I
10 would say, sure, you could have a certain number of years of
11 files.

12 So I kind of feel sandbagged by both sides, to tell
13 you the truth, and all of this is happening after the close of
14 discovery. By the way, you know, you may have a lot of
15 negotiations going about the telephone calls and about other,
16 you know, things that happened in depositions. As far as I'm
17 concerned, everything you did after I closed discovery over
18 objection is on you. The Court has no role in that. You've
19 operated by agreement, and you continued to operate by
20 agreement, which means if somebody doesn't want to do something
21 that's on you because you all waited to the end to do stuff
22 which now you think is very important, and that's not on me.

23 How long has discovery been going on in this case?
24 Even with the delay you're talking about, Ms. Rosen, we're
25 talking years of discovery. So be clear that those disputes

1 that you may or may not have, don't bring them here because
2 they're not my concern. You made an agreement to take
3 discovery outside of the cutoff. That's your issue and your
4 problem if it doesn't work out to your liking, not mine.

5 So the end result here is I'm going to give the
6 plaintiff these three years of files because I don't see the
7 burden or prejudice to the city, the three years in the Reyes
8 case, and that's it. If there is follow-up discovery that
9 needs to be done, it can be done as part of expert discovery
10 because, in fact, what you're really saying is that's why you
11 would need to do it.

12 Since you're already -- since you've already analyzed
13 these files because they've been produced in other litigation
14 and they've been produced essentially on the same kinds of
15 Monell issues that are raised here, I'm not really seeing -- it
16 strikes me as a little bit incredible to think that the city
17 hasn't actually figured out or tried to figure out whether
18 there's a Brady or Giglio violation in these materials since
19 they've been produced across cases, right?

20 So I don't see the burden, but I have to say the only
21 reason I'm doing this is to protect Mr. Rodriguez's rights
22 because I don't think it's fair to punish him for the fact that
23 you did not do what you should have done. That's the only way
24 I can read these papers, and I would suggest in the future when
25 you drop the ball on something you just say: I dropped the

1 ball.

2 People do. It happens. These cases are complex.
3 They're over many years. There's lots of them. I understand
4 why that might have happened, but I don't believe that the
5 appropriate thing to do is to try to find and, as I say,
6 retrofit an excuse to cover the fact that you just did not
7 pursue files that now you really think you should have.

8 Any comments, concerns, thoughts?

9 MS. ROSEN: Just from the city's perspective, Judge,
10 it was not apparent to me in this case that plaintiff was
11 pursuing the homicide files because there were numerous
12 discussions about lots of other discovery and it never came up.
13 So while CR files were brought up, hundreds and hundreds of
14 those, homicide files were not. Everybody makes strategic
15 decisions about how to pursue cases, and just in a couple of
16 the cases we have not produced homicide files because the cases
17 were bifurcated on the front end.

18 THE COURT: Right, which this case was not.

19 MS. ROSEN: This case was not. And, you know, we have
20 -- you know, part of my calculation in terms of what was in
21 play quite honestly has to do with our evaluation of the
22 strength of Mr. Rodriguez's case. If we evaluate the cases --
23 oops, sorry -- if we evaluate the Guevara cases across the
24 board, I have to say in all honesty Mr. Rodriguez's does not
25 strike us as one that has an enormous amount of strength, so it

1 would make sense to me that a plaintiff might not want to
2 invest. So that's my calculation, just to explain to the Court
3 that I wasn't lying in wait for plaintiff to drop the ball.

4 THE COURT: Okay.

5 MS. ROSEN: And quite frankly, had Ms. Brady at the
6 end of all this said to me "we dropped the ball, so is there
7 something we could do," this would have gone a different way.
8 It was the attempt to put it back on us and to then try and
9 recreate a story that was not the story that played out.

10 THE COURT: Well, I have to say that's my view of it,
11 too, but that doesn't change the fact that if I deny this
12 request the person I am really potentially penalizing is
13 Mr. Rodriguez and none of this is his fault. Frankly, given
14 the relative lack of burden on the city with respect to these
15 three years that have already been produced and, I'm guessing,
16 pretty heavily analyzed, I don't feel like I can in good
17 conscience penalize him in that way.

18 But I will reiterate that the best way to get what you
19 want is not to try to come up with an excuse that really
20 doesn't hold water under any serious analysis. It's to just
21 come in and say: Do you know what? We should have filed a
22 motion, and we didn't.

23 You know, I don't know what Ms. Rosen would have done
24 with that and the other parties or not, but I have to say I
25 find that a lot easier to deal with than this. By the way, you

1 know, none of this is free. I mean, both sides wrote extensive
2 position papers, and I just think it was completely a waste of
3 time. I mean, that's where I come out on this. So you will
4 produce the files.

5 MS. ROSEN: Can I just get a clarifying question?

6 THE COURT: Sure, yes.

7 MS. ROSEN: You're saying produce the Reyes files.

8 THE COURT: The Reyes files, the three years.

9 MS. ROSEN: All right. So that's actually four years
10 because it's '95, '96, '97, and '98.

11 THE COURT: Okay. All right, four years.

12 MS. ROSEN: I just wanted to make sure.

13 THE COURT: I apologize.

14 MS. ROSEN: No, no worries.

15 THE COURT: Obviously I have trouble counting.

16 MS. ROSEN: No. I most of the time do, too.

17 THE COURT: Well, like I say, if I could do math, I
18 probably would be in a different job. But, yes, as I said,
19 you're not going to do follow-up fact discovery, but if there
20 are, I think you could fairly raise some of these issues in
21 terms of your expert analysis. Like I said, I think your
22 expert has probably looked at this already because this issue
23 is cropping up in cases across the board.

24 So, you know, I do want to be clear. The only reason
25 I'm granting your request, plaintiff, is so your client is not

1 penalized and is not treated differently than the other Guevara
2 plaintiffs, not because I think the Curley GPR materially
3 changed anything between the parties because I most assuredly
4 do not. Okay?

5 So what I need from you guys and what Judge Rowland
6 needs is an order, an agreed order, if possible -- if not, I'll
7 do it -- for expert discovery. She wants it. It's clear that
8 you don't want to do dispositive motions before expert
9 discovery. That's a choice. You know, I'm okay with that.
10 She wanted to know. When you have that, I'll enter it and
11 you'll proceed.

12 I would really like you guys to think about exactly
13 how you're going to spend that time because we're going to have
14 an expert discovery period and we're not going to extend it
15 five times. It's going to be what it is. So build into your
16 thought process, both sides, what you really need to do and how
17 long, given everything that's going on in the world and
18 everything that's going in your other cases and everything,
19 period, build in enough time to do the jobs that your clients
20 need you to do. Okay? I'd much rather have a realistic
21 schedule which we can all abide by than, you know, constant
22 fights about extending it or not extending it.

23 As I said, with respect to the other issues that may
24 or may not be percolating between the parties regarding fact
25 discovery after the close of discovery, that's your ballgame,

1 not mine. So I suggest since you both want different things
2 from each other that you work it out. All right?

3 MS. ROSEN: Understood, Judge.

4 THE COURT: Okay. Thank you, everyone.

5 MS. ROSEN: Thanks, Judge.

6 MS. BRADY: Thank you.

7 THE COURT: Try to stay dry.

8 MS. ROSEN: Nice seeing you.

9 THE COURT: Nice seeing all of you.

10 MS. BRADY: Nice seeing you.

11 THE COURT: It's nice seeing all of you. Actually,
12 it's nice putting on my robe.

13 (Proceedings concluded.)

14 C E R T I F I C A T E

15 I, Patrick J. Mullen, do hereby certify that the
16 foregoing is an accurate transcript produced from an audio
17 recording of the proceedings had in the above-entitled case
before the Honorable SUSAN E. COX, one of the magistrate judges
of said court, at Chicago, Illinois, on May 3, 2020.

18 /s/ Patrick J. Mullen
19 Official Court Reporter
20 United States District Court
Northern District of Illinois
Eastern Division

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